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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ADAM ALEXANDER WILLIAMS,

Defendant.

**Case No. CR-22-33-BLG-SPW**

**SENTENCING MEMORANDUM**

COMES NOW Defendant, ADAM ALEXANDER WILLIAMS, by and through Defendant's counsel of record, the FEDERAL DEFENDERS OF MONTANA and GILLIAN E. GOSCH, Assistant Federal Defender, and offers this Sentencing Memorandum to this Honorable Court for Mr. William's sentencing hearing scheduled for October 20, 2022, at 3:00 p.m.

## **INTRODUCTION**

On March 17, 2022, Adam Alexander Williams, was named in a one count Indictment charging him with Interference with Flight Crew Members and Attendants in violation of 49 U.S.C. 46504. Adam made his initial appearance on April 20, 2022, via video and was placed on pretrial release. Adam changed his plea to the Indictment on June 30, 2022, before the Magistrate Judge and this Court accepted those findings and recommendations on July 21, 2022.

## **ADVISORY GUIDELINE RANGE**

Pursuant to the presentence report Adam's total offense level is 7 and his criminal history category is I. Therefore, his advisory guideline range is 0-6 months. There is a plea agreement in this case and Adam will have 1 day custody at the time of sentencing. Adam has remained compliant with his release conditions.

## **DISCUSSION-3553**

### **A. The Offense**

The offense conduct is sufficiently set forth in paragraphs 7-11 of the presentence report.

### **B. History and Characteristics of Adam Alexander Williams.**

In reviewing the PSR and Dr. Chesson's psychological evaluation, it would appear that Adam had a chaotic upbringing that left lasting wounds. He is a friendly and pleasant individual, as noted by his employer but does seem to struggle with

expressing himself and can be quite guarded when asked about personal issues. Counseling for both mental health and at a minimum a chemical dependency evaluation would be beneficial for Adam moving forward. Other than his arrest for the instant offense, Adam has led a mostly law-abiding life with the exception of multiple traffic citations, most recently a fleeing and eluding charge for which he was placed on a deferred sentence.

**C. Seriousness of the Offense, Respect for the Law and Just Punishment**

Adam respectfully requests that this court sentence him to a term of probation. This sentence will serve as punishment for Adam, while recognizing that this unfortunate incident appears to be an anomaly as Adam has lived a mostly law abiding life. A sentence of probation is sufficient but not greater than necessary to promote respect for the law and serve as just punishment.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of October, 2022

/s/ Gillian E. Gosch

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GILLIAN E. GOSCH

Federal Defenders of Montana  
Counsel for Defendant

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on October 11, 2022, a copy of the foregoing document was served on the following persons by the following means:

<u>1, 2</u>	CM-ECF
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<u>          </u>	E-Mail

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Defendant

/s/ Gillian E. Gosch  
\_\_\_\_\_  
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Counsel for Defendant